

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA**

NANCY R., pseudonymously,
Plaintiff,

v.

Case No. 5:25-cv-0462-G

PLAZA HOTELS, LLC; STEVE KETTER;
MICHAEL WILEY; OKC ARPORT ES, LLC;
ESH STRATEGIES FRANCHISE, LLC;
KAJAL HOSPITALITY, INC; JALIYAN
HOSPITALITY, INC; SUPER 8
WORLDWIDE, INC; RAJ KRUPA HOTEL,
LLC; DAYS INNS WORLDWIDE, INC;
CHAND & SAAJ HOSPITALITY, INC;
RAMADA WORLDWIDE, INC; YASH
ENTERPIRSES, INC; HOWARD JOHNSON
INTERNATIONAL, INC; NOOR HOTEL,
LLC; AMBICA, LLC; OM, LLC; INDRA, LLC;
AND G6 HOSPITALITY FRANCHISING,
LLC,

Defendants.

**DEFENDANT G6 HOSPITALITY FRANCHISING, LLC'S UNOPPOSED MOTION TO
EXTEND TIME OR OTHERWISE RESPOND TO PETITION UNDER RULE 12**

Defendant, G6 Hospitality Franchising, LLC ("G6") under LCvR6.3, files this, its request for any unopposed extension of time to file motions or a responsive pleading under Rule 12 of the Federal Rules of Civil Procedure, showing in support as follows:

1. Plaintiff, Nancy R. ("Plaintiff") initiated the litigation in the above-styled and captioned matter with an action captioned *Nancy R., pseudonymously v. Plaza Hotels, LLC, et al.*, Cause Number CJ-2025-1850 in the District Court of Oklahoma County, State of Oklahoma. In Plaintiff's state court Petition, Plaintiff asserted claims against the collective Defendants related to the Trafficking Victims Protection Reauthorization Act and Oklahoma Human Trafficking laws, *inter alia*. Counsel for Plaintiff agreed to an extension of time for G6 to respond to the Petition.

2. Subsequently, Defendants Super 8 Worldwide, Inc., Days Inns Worldwide, Inc., Ramada Worldwide, Inc., and Howard Johnson International, Inc. (collectively, the “Wyndham Franchisor Defendants”) removed this case to the United States District Court for the Western District of Oklahoma under 28 U.S.C. § 1331. [ECF No. 1.]

3. On May 28, 2025, Plaintiff filed a Motion to Amend/Correct her Petition. That motion is pending as of the date of filing this motion.

4. In light of the removal and the Plaintiff’s pending Motion to Amend/Correct, G6 seeks an extension of time to file a response to Plaintiff’s Petition.

5. On June 2, 2025, Plaintiff and Defendant G6 Hospitality Franchising, LLC agreed to a 21 day extension of time to file a response to Plaintiff’s amended Petition until after either Plaintiff’s Motion to Amend/Correct is denied or Plaintiff’s amended Petition is filed on the docket.

6. Accordingly, G6 respectfully requests that the Court enter an order granting G6 Hospitality Franchising, LLC a 21 day extension of time to file a response to Plaintiff’s amended Petition until after either Plaintiff’s Motion to Amend/Correct is denied or Plaintiff’s amended Petition is filed on the docket.

WIGGINS SEWELL & OGLETREE

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Certificate of Service

On this 2nd day of June, 2025, true and correct copy of the within and foregoing document was electronically transmitted to the Clerk of Court using the ECF System for filing and transmittal to the following counsel of record:

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